

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND, *et al.*,

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND  
COMMUNITY SERVICE, *operating as*  
AMERICORPS, *et al.*,

Defendants.

No. 1:25-cv-01363-DLB

**MOTION FOR A STAY OF THE JOINT STATUS REPORT AND OTHER PENDING  
DEADLINES IN LIGHT OF LAPSE OF APPROPRIATIONS**

The United States of America hereby moves for a stay of this Court's Order, ECF No. 187, for the parties to file a Joint Status Report and other pending deadlines in the above-captioned case.

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and those appropriations to the Department lapsed. The same is true for the majority of other Executive agencies, including the federal Defendants. The Department does not know when such funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys and employees of the federal Defendants are prohibited from working, even on a voluntary basis, except in very limited circumstances, including "emergencies involving the safety of human life or the protection of property." 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice therefore requests a stay of this Court's Order to file a Joint Status Report and other pending deadlines, until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. The Government requests that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations – i.e., each deadline would be extended by the total number of days of the lapse in appropriations.

5. Opposing counsel stated to counsel for the Government that they have no objection to this motion.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Government hereby moves for a stay of this Court's Order for the Parties to file a Joint Status Report and other pending deadlines in this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Dated: October 1, 2025

Respectfully submitted,

BRETT A. SHUMATE  
Assistant Attorney General  
Civil Division

ERIC J. HAMILTON  
Deputy Assistant Attorney General  
Civil Division, Federal Programs Branch

JOSEPH E. BORSON  
Assistant Branch Director  
Civil Division, Federal Programs Branch

/s/ Pierce J. Anon  
PIERCE J. ANON  
(N.Y. Bar No. 6184303)  
*Trial Attorney*

U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, N.W.  
Washington, DC 20005  
Tel.: (202) 305-7573  
Email: [Pierce.Anon@usdoj.gov](mailto:Pierce.Anon@usdoj.gov)

*Attorneys for Defendants*